

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Case No. 1:17-mc-00151-LPS

**SUPPLEMENTAL DECLARATION OF NATHAN P. EIMER IN SUPPORT OF
VENEZUELA PARTIES' SUPPLEMENTAL LETTER BRIEF IN SUPPORT OF THEIR
MOTION TO DISQUALIFY THE SPECIAL MASTER**

I, Nathan P. Eimer, declare as follows:

1. I am a partner at the law firm of Eimer Stahl LLP, and I am one of the counsel for PDV Holding, Inc. and CITGO Petroleum Corporation in the above-captioned action.

2. I make this supplemental declaration in connection with the Venezuela Parties' Supplemental Letter Brief in Support of Their Motion to Disqualify the Special Master based upon personal knowledge.

3. As described in my February 10, 2023 Declaration submitted in support of the Venezuela Parties' Reply in Support of Their Motion to Disqualify the Special Master, I did not speak with the Special Master via phone on December 30, 2022. D.I. 516 ¶¶ 4, 7.

4. I was in Australia on December 30, 2022 and did not return to my office until January 3, 2023.

5. The only phone number I have for the Special Master is 302-562-5232. To the best of my recollection, the Special Master has only called me from this number. Attached as Exhibit A is a true and correct copy of my contact card for the Special Master.

6. On January 3, 2023 at 2:02 p.m. CST, I called the Special Master at 302-562-5232 from my office line. He did not answer. Paukovitz Decl. Ex. A.

7. Later that day, at 4:26 p.m. CST, I called the Special Master from my mobile phone. *Id.* Ex. B. During this call, the Special Master informed me for the first time that the Venezuela Parties' counsel would not be permitted to attend his scheduled January 12, 2023 meeting with OFAC because the meeting would have an advocacy component and it would be inappropriate for them to attend given that they have a different agenda. *See* D.I. 516 ¶ 9.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 24th day of February, 2023, in Chicago, Illinois.

/s/ Nathan P. Eimer
Nathan P. Eimer